



National Association of State EMS Officials

201 Park Washington Court Falls Church, VA 22046-4527 www.nasemso.org
703-538-1799 fax 703-241-5603 info@nasemso.org

July 3, 2009

Diane La Valle
Office of Hazardous Materials Safety
Materials Special Permits & General Approvals
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
Washington, DC 20590

Re: Permit Reference # 14860-N

Dear Ms La Valle:

The National Association of State Emergency Medical Services Officials (NASEMSO) supports the waiver or variance to 49 CFR, Part 173.302(f) as noted in the Permit Referenced #14860-N by Alaska Airlines: "To authorize the transportation in commerce of cylinders of compressed oxygen and oxidizing gases without rigid outer packaging when no other means of transportation exist (modes 4, 5)."

Our Association represents the directors, medical directors, trauma coordinators and other state officials who lead statewide systems of emergency medical care in the 56 states and territories.

To limit the transport of medical oxygen to operations using only the type of rigid outer packaging proposed, will have a serious negative impact on health care and emergency medical services systems where transport is either exclusively available or most advantageous by air. For instance, in the state of Alaska, approximately 75% of the communities are not accessible by roads, and nearly two-thirds have year round access by air transportation only. There are approximately 16 hospitals, 142 community clinics, and 160 community emergency medical services affected by this rule since they depend upon air cargo for shipment of medical oxygen. The costs and logistics involved in transitioning to rigid outer packaging would make medical oxygen transport prohibitive in the types of aircraft depended upon to get into these Alaskan communities.

In addition to the impossibility of alternative modes of transport in Alaska are the practical considerations for providing medical oxygen in other rural and frontier communities in the United States. Where logging and other roadways, and boat transport may exist year round to serve the purpose of transporting medical oxygen by ground and sea, air transport may be the most efficient and cost-saving routine for this purpose.

Thank you for your consideration of these comments.

Steven Blessing, President